BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL PROTECTION OF THE SERVICE OF

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF RECORDING INDUSTRY ASSOCIATION OF AMERICA TO USPS WITNESS TOLLEY (RIAA/USPS-T-6-1)

Pursuant to Sections 25 and 26 of the rules of practice, Recording Industry Association of America ("RIAA") submits the attached interrogatory to USPS witness Tolley: RIAA/USPS-T-6-1. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

lan D. Volner

N. Frank Wiggins

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Counsel for Recording Industry Association of America

RIAA/USPS-T-6-1. Do your Test Year After Rates (for example, Table 1 of USPS-T-6 at page 5, consider that the parcel surcharge proposed by witness Moeller (USPS-T-35 at 6-8) might result in the migration of eligible pieces (such as audio and video recordings) from the Standard A class of mail to Media Mail?

- (a) If so, what do you calculate the amount of that migration to be and where does the migration effect appear in your testimony or supporting documents?
 - (b) If not, why not?

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CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

Im Volumer